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13 *Attorneys for Plaintiffs and the Proposed Class*

14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 PETER SCHUMAN, an individual, and
18 WILLIAM COPLIN, an individual, on behalf
of themselves and on behalf of others
19 similarly situated,

20 Plaintiffs,

21 v.

22 MICROCHIP TECHNOLOGY
INCORPORATED, a corporation; ATMEL
23 CORPORATION, a corporation; and ATMEL
CORPORATION U.S. SEVERANCE
24 GUARANTEE BENEFIT PROGRAM, an
employee benefit plan,

25 Defendants
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Case No. 4:16-CV-05544-HSG

CLASS ACTION

**STIPULATION AND ORDER ENLARGING
PLAINTIFFS' TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

[Civ. L.R. 6-2]

Hearing Date: June 22, 2017

Time: 2:00 p.m.

Ctrm.: 2, Floor 4

Judge: Hon. Haywood S. Gilliam, Jr.

Action Filed: September 29, 2016

Trial Date: Not yet set

1 Plaintiffs Peter Schuman and William Coplin (collectively “Plaintiffs”) and Defendants
2 Microchip Technology, Inc., Atmel Corporation, and Atmel Corporation U.S. Severance Guarantee
3 Benefit Program (collectively “Defendants”), herein referred to collectively as the “Parties,” hereby
4 stipulate, by and through their respective attorneys of record, as follows:

5 WHEREAS, Defendants filed a Rule 12(b)(6) motion to dismiss Plaintiffs’ Amended
6 Complaint on April 28, 2017 (Dkt. 33);

7 WHEREAS, on April 28, 2017, Defendants also filed a motion to dismiss the complaint in
8 the related case *Berman, et al. v. Microchip Technology, Inc., et al.*, Case No. 5:17-CV-01864-HSG
9 (N.D. Cal.), in which the plaintiffs are represented by the same counsel representing Plaintiffs in this
10 matter;

11 WHEREAS, pursuant to Civil Local Rule 7-3(a), Plaintiffs’ oppositions to Defendants’
12 motions to dismiss in both cases are currently due May 12, 2017;

13 WHEREAS, Defendants agree to extend the deadline for Plaintiffs to respond to both
14 motions to dismiss to and including May 31, 2017; and

15 WHEREAS, the stipulated extension of time for Plaintiffs to respond to Defendants’ motions
16 to dismiss will not affect any other dates or deadlines in this case;

17 THEREFORE, THE PARTIES HEREBY STIPULATE that Plaintiffs’ time to respond to
18 Defendants’ motion to dismiss (Dkt. 33) is extended up to and including May 31, 2017. The hearing
19 on the motion will remain set for June 22, 2017 at 2:00 p.m., or as soon thereafter as this Court is
20 available.

21 Respectfully submitted,

22 Dated: May 8, 2017

/s/Michael Rubin

Michael Rubin

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8 *Attorneys for Plaintiffs and the Proposed Class*

9 Dated: May 8, 2017

10 /s/Mark G. Kisicki
11 Mark G. Kisicki
12 (E-signature authorized on May 8, 2017)


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27 *Attorneys for Defendants*

28 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May 9, 2017


The Hon. Haywood S. Gilliam, Jr.
United States District Judge

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1. I am a member in good standing of the bar of the State of California and am one of the counsel of record for Plaintiffs Peter Schuman and William Coplin (collectively “Plaintiffs”) in the above-captioned case. I am also one of the counsel of record for Plaintiffs Robin Berman, Bo Kang, Khashayar Mirfakhraei, Thang Van Vu, Donna Viera-Castillo, Girish Ramesh, Patrick Hanley, Ilana Shternshain and Mandy Schwarz in the related case *Berman, et al. v. Microchip Technology, Inc., et al.*, Case No. 5:17-CV-01864-HSG (N.D. Cal.). I make this declaration in support of the Parties’ stipulated request to enlarge the time for Plaintiffs to respond to Defendants’ motion to dismiss. The facts set forth in this declaration I know to be true of my own personal knowledge, except where stated to be based on information and belief.

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